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10 IVETTE RIVERA

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IVETTE RIVERA,
Plaintiff,

v.

AMERICAN FEDERATION OF STATE,
COUNTY, AND MUNICIPAL EMPLOYEES,
AFL-CIO, LOCAL 444,
Defendant.

Case No. 3:16-cv-04959 WHO

**STIPULATION AND ORDER
TO CONTINUE HEARING DATE ON
MOTIONS TO DISMISS AND
SANCTIONS**

Judge: Hon. William H. Orrick
Courtroom: 2, 17th Floor

1 PLEASE TAKE NOTICE that the parties to this action, Plaintiff IVETTE RIVERA and
2 Defendant AMERICAN FEDERATION OF STATE, COUNTY, AND MUNICIPAL
3 EMPLOYEES, AFL-CIO, LOCAL 444 ("Local 444"), hereby stipulate to continue the existing
4 hearing date, June 7, 2017, at 2:00 p.m., on Defendant Local 444's Motion to Dismiss and
5 Sanctions (Doc. No. 25) and Motion for Sanctions (Doc. No. 29), to June 28, 2017, at 2:00 p.m.

6 There exists good cause in which to grant this stipulation as Plaintiff's lead trial counsel,
7 David M. Poore, will be on a pre-paid vacation out of state, with limited access to phone and
8 email, from June 7, 2017, to June 16, 2017. The parties have met and conferred, and consulted
9 with the Court's clerk about an appropriate hearing date, and all parties stipulate to a hearing date
10 on June 28th.

11 The parties are not making this request for the purpose of any undue delay, and no party
12 would suffer any prejudice if this stipulation was granted.

13 IT IS HEREBY STIPULATED between the parties that the hearing date set for June 7,
14 2017, at 2:00 p.m., be continued to June 28, 2017, at 2:00 p.m.

15 SO STIPULATED.

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17 Dated: May 23, 2017

WEINBERG, ROGER & ROSENFELD

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19 //s// Emily Rich

EMILY RICH

Attorneys for Defendant LOCAL 444

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21 Dated: May 23, 2017

BROWN | POORE LLP

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23 //s// David M. Poore

DAVID M. POORE

Attorneys for Plaintiff IVETTE RIVERA

1 **CIVIL LOCAL RULE 5-1(i)(3) ATTESTATION**

2 I hereby attest that concurrence in the filing of this document has been obtained from each
3 of the other signatories to this document.

4 DATED: May 23, 2017

By: /s/David M. Poore

5 DAVID M. POORE
6 Attorney for Plaintiff
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12 **PROPOSED ORDER**

13 GOOD CAUSE SHOWING, the Stipulation is GRANTED. There exists good cause in
14 which to continue the hearing date on Defendant's Motion to Dismiss and Sanctions (Doc. No.
15 25) and Motion for Sanctions (Doc. No. 29), due to the unavailability of Plaintiff's lead trial
16 counsel on a pre-paid vacation.
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18 IT IS HEREBY ORDERED that the hearing date of June 7, 2017, be continued to June
19 28, 2017, at 2:00 p.m., in Courtroom 2, 17th Floor.

20 SO ORDERED.

21 Dated: June 2, 2017

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23 UNITED STATES DISTRICT COURT
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